3.18 THEORETICAL BUILD OUT

The theoretical build-out scenario is included in the Draft General Plan Program Environmental Impact Report (Program EIR) to provide the reader with the ability to understand the worst-case scenario of full, but theoretical development of the General Plan.[1] The theoretical build-out scenario demonstrates residential and non-residential development levels that could theoretically be achieved by the Draft General Plan. The Draft General Plan does not change adopted plan land use or zoning designations currently in place, but provides land use categories that may be used during community plan updates and amendments. Since the Draft General Plan does not propose changing adopted community plan land use or zoning designations, the density and floor area ratio (FAR) proposed in the theoretical maximum build out of all lands was estimated using the assigned land use designations from adopted community plans and zoning designations.

Unlike a forecast, the theoretical build-out scenario does not have a time horizon, such as 2030, nor does it include transportation, demographic, existing land use, or economic assumptions typically used by a forecasted model to provide more realistic land use planning data. Therefore, due to regulatory constraints, physical constraints, and foreseeable market conditions, realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units and non-residential building square feet to allow the build-out estimates presented on **Tables 3.18-1** and **3.18-2** respectively.

Theoretical build out of land within the City of San Diego would be a substantial change in the level of residential and non-residential development described in the Existing Conditions.

Multifamily Residential Development

Under the theoretical build-out scenario, when compared to the Existing Conditions, there would be a 54 percent increase in total housing units (which would be predominantly multifamily) and a 439 percent increase in non-residential (commercial, industrial and public) building square feet. Theoretical build out assumes full development of all multifamily designated land in Coastal, Post World War II Suburban (1945-1970), and Pre World War II (pre 1945) communities at the maximum allowable community plan designated density (units per acre). It also assumes that full development build out of the 53,100 units identified in the 2006 adopted Downtown Community Plan. The theoretical build out scenario does not assume any additional development of multifamily units beyond the 2030 Forecast in Master Planned Suburban (1970-present) and Newer Urban (1960-present) communities. Refer to the notes listed in Table 3.18-1 for additional details.

Given the generalized, highly theoretical nature of this build-out analysis, the analysis did not account for variations due to the implementation of additional regulations or site-specific conditions that could affect attainment of density. Specifically for Post World War II Suburban and Pre World War II communities, the theoretical build-out scenario does not consider existing

[1] This section was provided to be responsive to a 2003 court decision regarding the El Dorado County General Plan which required that the El Dorado County address theoretical build–out.

built conditions, type of ownership, historic value, regulatory constraints and physical constraints. Regulations, such as those addressing parking requirements and Environmentally Sensitive Lands regulations may make attainment of maximum densities infeasible, and site specific easements may restrict development of certain properties to levels below what is permitted by the base zoning ordinance. For example, the zoning may allow the development of a certain number of units on a parcel, but a portion of the site could be constrained due to environmentally sensitive lands and/or height limitations; thereby reducing the feasibility of the parcel developing at the maximum allowed units.

The analysis did not include density bonus regulations that could allow for additional units. The analysis assumes that existing mobile homes and single-family units located on adopted community plan designated multifamily land would be developed for multifamily units as part of the theoretical build-out scenario. This assumes that all existing units on a parcel are either demolished and new residential units are constructed or that additional units are added to the parcel to the maximum allowed. For example, a parcel may have 28 existing multifamily units on-site; however, the units per acre (density) would allow up to a total of 30 multifamily units. The theoretical built out scenario assumes that the existing 28 units would be demolished and replaced with 30 units for an increase of two units. While theoretically possible, the likelihood of this occurring for a slight increase in total units is unrealistic due to the high cost of development.

The realization of this scenario is highly unlikely, but the program EIR includes an analysis of this scenario because the General Plan land use categories do provide the theoretical capacity for residential units. Another variable is that decision-makers have the authority to approve, deny, or modify discretionary projects based on site-specific factors and project level environmental analysis.

Non-Residential Development

For non-residential development, the theoretical build out scenario also assumes the full utilization of the allowable zoning ordinance floor area ratio (FAR) (to derive total building square footage except for Downtown) for land that is designated for retail, office, and industrial uses under the Draft General Plan. The theoretical build-out scenario includes the build out building square footage from the 2006 adopted Downtown Community Plan. Although theoretically possible based only on the allowable maximum floor area ratio, there could be constraints in place that limit or reduce the feasibility of additional square footage at the maximum floor area ratio, such as physical constraints, regulatory or environmental constraints, or economic market conditions. For example, a parcel may allow the development of maximum amount square footage based on the FAR, but a portion of the site could be constrained by environmentally sensitive lands, which would reduce the site area and could affect the ability to provide the required amount of parking; thereby reducing the feasibility of the parcel developing at the maximum allowable FAR. Another variable is that decision-makers have the authority to approve, deny, or modify discretionary projects based on site-specific factors.

SANDAG 2030 Forecast (Year 2030 Scenario)

As part of the SANDAG forecast process, the City provides land use inputs to SANDAG addressing the feasibility of development to existing conditions and constraints that may limit future development. By 2030, SANDAG forecasts that approximately 107,400 additional multifamily units could be built within the City, which is a 54 percent increase in multifamily units from 2004 consistent with adopted community plan land use designations. Overall, when including the additional single-family units, SANDAG forecasts a 24 percent increase in the total number of units by 2030.

It is important to note that the SANDAG 2030 Regional Growth Forecast does not forecast building square footage. The City based the 2004 and 2030 building square feet estimates on the SANDAG (Series 11) 2030 Regional Growth Forecast for Civilian Employment. For the purposes of this Program EIR, the City derived the building square footage estimates from the forecast by using typical square feet per employee by land use designation (retail, office, and industrial) ratios. The City used building square footage estimates for 2030, so that it could be compared relationship to the theoretical build out scenario as part of the environmental analysis. Since uses with lower employment densities, such as industrial, typically have more square footage per employee than uses with higher employment densities, such as office, it is difficult to use gross estimate of total square footage as an indicator of employment growth.

The SANDAG 2030 forecast uses an econometric forecast for regional employment population growth for the San Diego region based on national and statewide forecasts that incorporate demographic and economic factors. SANDAG uses employees per acre by land use types rather than building square footage in the forecast process. Between 2004 and 2030, SANDAG forecasts that the civilian employment will increase by 24 percent in the City.

SANDAG forecasts that the percentage increase for both new housing units and civilian jobs are at 24 percent for the City. The forecast indicates that jobs to housing ratio (civilian employment per housing unit) increases less than one percent from 1.60 in 2004 to 1.61 by 2030. During this same period, that employment density in the City increases by 10 percent from 24.8 to 27.4 civilian employments per developed employment acre.

Comparison between the Theoretical Build Out and the SANDAG 2030 Forecast Scenarios

Although the theoretical build-out scenario does not have a time horizon associated with it, there could be substantially more development than forecasted under the Year 2030 scenario. When comparing the two scenarios, there could be 24 percent more total housing units (which would be predominantly multifamily) and 298 percent more non-residential building square feet. The theoretical build-out scenario assumes for residential development that existing land uses, located on plan designated multifamily land, would redevelop or infill at the maximum point of their adopted community plan residential density range. For non-residential (commercial and industrial uses), the analysis assumes that all existing land uses, located on plan designated non-residential land, would redevelop or infill at the maximum allowed zoning ordinance FAR.

Table 3.18-1
Comparison between the Theoretical Build Out Scenario and the SANDAG 2030 Forecast Scenario for Housing Units

Housing Units	SANDAG 2030 Forecast				Theoretical Build Out				
	Base Year	Horizon Year	Change from Existing Conditions		Theoretical	Change from Existing Conditions		Change from 2030 Forecast	
	2004	2030	Numeric	Percent	Build Out	Numeric	Percent	Numeric	Percent
Single Family	285,435	297,759	12,324	4%	272,200	-13,235	-5%	-25,599	-9%
Multifamily	199,188	306,655	107,467	54%	480,100	280,912	141%	173,445	57%
Mobile Homes	5,625	5,635	10	0%	2,100	-3,525	-63%	-3,535	-63%
Total	**490,266**	**610,049**	**119,783**	**24%**	**754,400**	**264,134**	**54%**	**144,351**	**24%**

Notes:

1) The theoretical build-out scenario was prepared solely for the purposes of the General Plan Environmental Impact Report only and should not be used for any other long range planning purposes.
2) Build out generally refers to the theoretical maximum build out of all lands within the planning area in accordance with assigned land use designations.
3) Theoretical build-out scenario assumes full development of all multifamily designated land in Coastal, Post-World War II Suburban (1945-1970), and Pre-World War II (pre 1945) communities at the maximum allowable community plan designated density (units per acre).
4) Theoretical build-out does scenario not assume any additional development of multifamily units beyond the (Series 11) 2030 Forecast in Master Plan Suburbs (1970-present) and Newer Urban (1960-present) communities. Theoretical build out assumes that full development build out of the 53,100 units identified in the 2006 adopted Downtown Community Plan.
5) The reduction of single family units is the result of existing single family units located on adopted community plan designated multifamily land that would be developed for multifamily units as part of the theoretical build out.
6) The reduction of mobile units is the result of existing mobile units located on adopted community plan designated multifamily land that would be developed for multifamily units as part of the theoretical build out.
7) Theoretical build out scenario does not assume any additional development of single-family units beyond the (Series 11) 2030 Forecast.
8) Multifamily units include units that are developed on mixed-use designated land.
9) Although theoretically possible based only on the allowable maximum density, there could be constraints in place that would limit or reduce the feasibility of additional units at the maximum density, such as physical constraints, regulatory constraints, or market conditions.
10) The (Series 11) 2030 Region Growth Forecast allocated additional multifamily units to multifamily designated land considered more feasible for future development.
11) The (Series 11) 2030 Region Growth Forecast was approved by the SANDAG Board for planning purposes in September 2006. The 2030 Forecast uses the Year 2004 as a base year and 2030 as the forecast horizon year.

Table 3.18-2
Comparison between the Theoretical Build Out Scenario and the SANDAG 2030 Forecast Scenario for Total Non-Residential Square Feet

SANDAG 2030 Forecast (Estimates)				Theoretical Build Out				
Base Year	Horizon Year	Change from Existing Conditions		Theoretical	Change from Existing Conditions		Change from 2030 Forecast	
2004	2030	Numeric	Percent	Build Out	Numeric	Percent	Numeric	Percent
203,833,250	275,702,300	71,869,050	35%	1,097,680,700	893,847,450	439%	821,978,400	298%

Notes:
1) The theoretical build-out scenario was prepared solely for the purposes of the General Plan Environmental Impact Report only and should not be used for any other long range planning purposes.
2) Build -out scenario refers to the theoretical maximum build out of all lands within the planning area in accordance with assigned land use designations.
3) The SANDAG 2030 Regional Growth Forecast does not forecast building square footage. The 2004 and 2030 building square feet estimates are based on the SANDAG (Series 11) 2030 Regional Growth Forecast for Civilian Employment. The building estimates were derived from the forecast by using typical square feet per employee by land use designation (retail, office, and industrial) ratios as in the table below.

Generalized Land Use Type	Description	Square Foot per Employee
Visitor Commercial	Hotel/Motel (Lo-Rise)	1400
Visitor Commercial	Hotel/Motel (Hi-Rise)	1000
Visitor Commercial	Resort	1000
Industrial	Heavy Industry	550
Industrial	Industrial Parks	400
Industrial	Light Industry-General	400
Industrial	Warehousing and Public	800
Retail Commercial	Wholesale Trade	500
Retail Commercial	Regional Shopping	450
Retail Commercial	Community Shopping	400
Retail Commercial	Neighborhood Shopping	350
Retail Commercial	Specialty Commercial	300
Retail Commercial	Automobile Dealerships	300
Retail Commercial	Store-Front	300
Retail Commercial	Other Retail Trade	300
Office Commercial	Office (High-Rise)	300
Office Commercial	Office (Lo-Rise)	300
Office Commercial	Government Office/Civic	300

Notes:
1) The theoretical build-out scenario for square feet assumes the full utilization of the allowable zoning ordinance floor area ratio (FAR) for land that is designated for retail, office, and industrial uses, except for downtown. The theoretical build-out scenario includes the build out building square footage that is reported in the 2006 adopted Downtown Community Plan.
2) Although theoretically possible based only on the allowable maximum floor area ratio, there could be constraints in place that would limit or reduce the feasibility of additional square footage at the maximum floor area ratio, such as physical constraints, regulatory constraints, or market conditions.
3) The (Series 11) 2030 Region Growth Forecast allocated additional multifamily units to multifamily designated land considered more feasible for future development.
4) The (Series 11) 2030 Region Growth Forecast was approved by the SANDAG Board for planning purposes in September 2006. The 2030 Forecast uses the Year 2004 as a base year and 2030 as the forecast horizon year.

Table 3.18-3
SANDAG 2030 Forecast for Civilian Employment

Base Year	Horizon Year	Change from Existing Conditions		Remaining Forecast Capacity
2004	2030	Numeric	Percent	Beyond 2030
782,245	980,374	198,129	25%	74,133

3.18.1 Agricultural Resources

Although the theoretical build-out scenario does not assume the development of land designated or zoned for agricultural uses and there are not any Williamson Act designated farmlands within the City, the level of development associated with this scenario would have the potential to impair the productivity of agricultural lands because of effects caused by greater residential and employment population growth. The increase in population associated with this scenario would limit the ability of farmers to use pesticides, which is essential for agricultural resources. The increase in population would also have higher water demands, which would affect water supplies currently used for farming.

It is infeasible at this program EIR level to provide specific mitigation that would reduce impacts to a less than significant level since no specific development projects are proposed. Due to the level of development under the theoretical build-out scenario, and the lack of specific development projects and associated project-level mitigation, the impacts to agricultural resources would be significant and unavoidable.

3.18.2 Air Quality

Under the theoretical build-out scenario, the increase in population associated with the significant increase in residential and non-residential development would add a substantial number of automobile, train, truck, transit, or airplane trips or stationary source emissions, which could potentially affect San Diego's ability to meet regional, state and federal clean air standards, including the Regional Air Quality Strategy or State Implementation Plan. Under the Year 2030 scenario, infill and redevelopment of residential and non-residential uses would occur in close proximity to transit stations and corridors. This is intended to relieve some of the increased automobile trips that would have otherwise occurred without alternative transportation planning in mind and could positively affect San Diego's air quality.

Under the theoretical build-out scenario, the increase in development and population could also create air emissions that could substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations. The construction needed to create this increase in density would be a considerable source of NO_X, CO_2, and ROG from the diesel fuel used to operate construction equipment. Construction activities also associated

with the theoretical build-out scenario would generate additional vehicle trips by construction workers traveling to and from construction sites. Therefore, implementation of the theoretical build-out scenario would result in localized short-term air quality impacts.

Although mitigation framework measures summarized in **Section 3.2.4** would reduce impacts, the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario would result in impacts to air quality that could not be mitigated without major advancements in technology or restrictions on travel. It is also infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level since no specific development projects are known. Therefore, impacts would be significant and unavoidable.

3.18.3 Biological Resources

Under the theoretical build-out scenario the level of development may not substantially alter the expected development footprint, but the infill and redevelopment associated with this scenario would lead to a considerably larger residential and employment population within the City, beyond the anticipated growth scenarios forecasted by SANDAG and planned for in the Year 2030 scenario. Although additional development under theoretical build-out scenario would not necessarily encroach into protected habitats, it would be reasonable to assume that an increase in impacts on the edge of habitats (including wetlands) would occur from increased population.

Habitat areas are easily degraded by anthropogenic influences, and the growth in residential and employment population resulting from the build-out scenario could lead to impacts to biologic resources. Unique, rare, endangered, sensitive, or fully protected species of plants or animals could be more vulnerable due to the increased likelihood of interaction between humans and habitat areas. Many of the areas within the City that are designated for preservation do allow for passive recreational uses, and the admittance of dogs. Increased use of preserve areas, even for passive recreation, can interfere with species functions, including the movements of resident or migratory fish or wildlife species.

Under the theoretical build-out scenario, the increased level of development could also result in increased noise levels throughout the City. Construction activities associated with the theoretical build-out scenario would generate elevated noise from construction. An increase in automobile, truck, transit, rail, aircraft traffic associated with residential and employment population growth would lead to a general increase in ambient noise levels. An increase in noise levels has the potential to affect behavioral and physiological responses in noise-sensitive wildlife receptors. Adverse responses to increased noise may include hearing loss or the temporary masking of vocalizations commonly used during the breeding season, nest abandonment, and decrease in predator awareness, thereby resulting in a decrease in reproductive and overall fitness of certain animal species.

Although mitigation framework measures summarized in Section 3.3.4 would reduce impacts to biologic resources, the magnitude of change under the theoretical build-out scenario would result in substantial impacts to biologic resources. It is infeasible at this program EIR level to provide

more specific mitigation that would reduce impacts to a less than significant level because no specific projects are know. Therefore, these impacts would be significant and unavoidable.

3.18.4 Geologic Conditions

Under the theoretical build-out scenario, there could be increased development on steep slopes or areas prone to geologic hazards, which would not occur to the same extent under the Year 2030 scenario. It is assumed that under the theoretical build-out scenario, development will occur at the maximum allowable residential density and non-residential FAR, but these assumptions do not account for geologic constraints that could affect the level of development. Many of the existing developments within the City are already built-out to the maximum extent feasible under the constraints that the surrounding geologic conditions impose, which may be less than theoretically allowed. The increased level of development associated with the theoretical build-out scenario could require the alterations of cliffs, hillsides, and shorelines.

Although mitigation framework measures summarized in **Section 3.4.4** seek to reduce the impacts and risks, in certain instances under a theoretical build-out scenario, structures would be located on geological units or soils that are unstable or that would become unstable and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction or collapse. As a result, a greater number people and properties could be exposed to geologic hazards such as groundshaking, fault rupture, landslides, mudslides, ground failure, or similar hazards even though available mitigation would be applied. Also, since no specific development projects are identified, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level. Therefore, these impacts would be significant and unavoidable.

3.18.5 Health and Safety

Under the theoretical build-out scenario, development could occur on contaminated sites located throughout the City. This increased level of development could also lead to an increase in the number of underground storage tanks and thus, potentially more leaking underground storage tanks. New development and redevelopment could result in the increased use, transport, and disposal volumes of hazardous materials within the City. All of these conditions would create a much more substantial risk of exposure to people or sensitive receptors to potential health hazards over the Year 2030 scenario because of the amount of volume of development that would have to occur to create theoretical build-out conditions.

Under the theoretical build-out scenario, the increased level of development would also result in increased growth in residential and employment population. As a result, a greater number of people and structures could be at risk of significant loss, injury or death from wildland fires, flooding, seiches, tsunamis, mudflows or aircraft operations accidents. The adopted emergency response plan and emergency evacuation plan are not based on the increased level of development associated with the theoretical build-out scenario as a result they would need to be updated to address the increased population.

Although mitigation framework measures summarized in **Section 3.4.4** would lessen impacts, due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and associated population growth, reduction to a less than significant level is unlikely. Also, since no specific development projects are proposed, it is infeasible at this program EIR level to provide more specific mitigation measures that would reduce impacts to a less than significant level. Therefore, impacts to community health and safety would be significant and unavoidable.

3.18.6 Historic Resources

Under the theoretical build-out scenario, extensive grading of large amounts of area within the City could be necessary - much more than would be anticipated under the Year 2030 scenario. Because the majority of these projects would be infill and redevelopment, this grading would occur on previously graded surfaces. Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing such resources has been removed. Sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements, etc.) have the greatest likelihood of encountering archaeological resources.

Under the theoretical build-out scenario, it is assumed that future development would involve mass grading, road construction, underground parking areas, sea walls, underground tanks, new pipelines or replacement of pipelines, potentially at a lower depth than the previous development. It is assumed that many future projects could also require subterranean parking, causing the likelihood of impacts of historical resources to amplify because of the increased depth of grading. The demolition of buildings and surface clearance could result in impacts to archaeological resources. Within the City, prehistoric human remains have been uncovered during both previous archaeological investigations and grading activities. The potential for encountering human remains during construction development activities is possible and impacts to human remains under the theoretical build-out scenario could occur.

Since the theoretical build-out scenario does not include assumptions concerning the preservation of historical resources, the substantial redevelopment of all Pre-World War II communities under the theoretical build-out scenario has the potential to cause significant impacts to architectural resources. Many of these structures (though not recognized on any official historic preservation list) still contain valuable elements of San Diego history. The total redevelopment of these areas under the theoretical build-out scenario would be a significant loss to the historic record of the City.

It is infeasible at this program EIR level to provide specific mitigation that would reduce impacts to a less than significant level since no specific development projects are proposed. Due to the magnitude of grading that would be required to support the infill and redevelopment of residential and non-residential densities under the theoretical build-out scenario, the potential for adverse physical or aesthetic effects to prehistoric, historic, or architecturally significant buildings, structures, objects, or sites; or in impacts to existing religious or sacred uses within the

City or the disturbance of any human remains, including those interred outside formal cemeteries would be significant and unavoidable.

3.18.7 Hydrology

Under the theoretical build-out scenario, there would be substantially more development than that forecasted under the Year 2030 scenario. When comparing the two, there would be 24 percent more total housing units (which would be predominantly multifamily) and 298 percent more non-residential building square feet. This would also lead to a substantial change in absorption rates, drainage patterns, and the rate of surface runoff. To achieve the theoretical build-out scenario, it was assumed for residential development that existing land uses located on plan designated multifamily land would redevelop or infill at the maximum point of their adopted community plan residential density range. For non-residential (commercial and industrial uses) it is assumed that all existing land uses located on plan designated non-residential land would redevelop or infill at the maximum allowed zoning ordinance floor area ratio. This level of development under the theoretical build-out scenario could lead to considerably more non-permeable surface added to the environment. This additional non-permeable surface area would limit absorption rates, radically alter drainage patterns, and substantially increase the rate of surface runoff.

Although mitigation framework measures summarized in **Section 3.7.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, the impacts to absorption rates, drainage patterns, and the rate of surface runoff would be significant and unavoidable.

3.18.8 Land Use

Under the theoretical build-out scenario, the increased level of development could also result in physically dividing established communities or creating incompatibilities between adjacent land use densities and intensities throughout the City. The analysis assumes that existing mobile homes and single-family units located on adopted community plan designated multifamily land would be developed for multifamily units as part of the theoretical build-out scenario. The theoretical scenario also assumes the full utilization of the allowable zoning ordinance floor area ratio for land that is designated for retail, office, and industrial uses under the Draft General Plan. It is likely that under the theoretical build-out scenario, small parcels will be consolidated as part of larger full block developments.

Although the mitigation framework measures summarized in **Section 3.8.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the level of development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, impacts related to land use would be significant and unavoidable under the theoretical build-out scenario.

3.18.9 Mineral Resources

Although development would limit access to mineral resources and possibly limit the ability for extraction, the construction needed to create this increase in density would considerably affect the supply of regional mineral resources, particularly sand and gravel. The use of regionally mined materials for development is desirable as it reduces the need for trucking materials over long distances, thus reducing costs. Regional sand and gravel sources could be depleted and unable to support the magnitude of development required under the theoretical build-out scenario. As such, the combination of the magnitude of change in the level of development under this scenario and the lack of available mitigation measures to lessen these impacts would result in significant and unavoidable impacts to mineral resources (e.g. sand and gravel).

3.18.10 Noise

Under the theoretical build-out scenario, the increased level of development could also result in increased noise levels throughout the City. Construction activities associated with the theoretical build-out scenario would generate elevated noise from construction. An increase in automobile, truck, transit, rail, aircraft traffic associated with residential and employment population growth would lead to a general increase in ambient noise levels. An increase in noise levels has the potential to affect noise-sensitive receptors and uses.

Although mitigation framework measures summarized in **Section 3.10.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, and all impacts to noise would be significant and unavoidable under the theoretical build-out scenario.

3.18.11 Paleontological Resources

Under the theoretical build-out scenario, the increased level of development could result extensive grading of areas within the City, which would be more than is anticipated under the Year 2030 scenario. It is likely that under this scenario grading would occur on previously graded surfaces since the majority of the future development would be associated with infill and redevelopment.. The bedrock formation on areas previously graded will be closer to the surface, so even shallow excavations, such as building footings, may extend into formations. Projects involving extensive grading, road construction, underground parking areas, sea walls, underground tanks, or new pipelines or replacement of pipelines at a lower depth than the original installation could extend into valuable formations. It is likely that under the theoretical build-out scenario, many projects would require subterranean parking, causing the likelihood of impacts to paleontological resources to increase. The increase in residential and employment population associated with the theoretical build-out scenario could also require additional roads, pipelines, storage tanks and other infrastructure, which could require grading or subterranean investigation.

Due to the magnitude of grading that could be required to support development under theoretical build out, and the lack of specific development projects and associated project-level mitigation, the impacts to unique paleontological resources or a geologic formations possessing a medium to high fossil bearing potential would be significant and unavoidable.

3.18.12 Population and Housing

Under the theoretical build-out scenario, it is assumed that there would be a 24 percent increase in the total amount of housing units above the forecasted Year 2030 scenario. While it is likely that the increase supply of housing units could provide for additional housing opportunities and the replacement of substandard housing with newer housing units, it is also likely that residents of older housing units could be displaced as a result of the demolition and replacement of older housing units with newer and more expensive housing units. This displacement could be particularly substantial in the mobile home communities. In some instances, people could have access to City, state, and federal programs providing housing assistance.

Although mitigation framework measures summarized in **Section 3.12.4** would seek to reduce displacement impacts, it is infeasible at this program EIR level to provide mitigation that can reduce such impacts to a less than significant level, since specific development projects are not known. For this reason and due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario, the physical environmental effects related to the construction of replacement housing would be significant and unavoidable.

3.18.13 Public Services and Facilities

Under the theoretical build-out scenario, it is assumed that there would be a 24 percent increase in the total amount of housing units above the forecasted Year 2030 scenario. This could lead to a residential population within the City, which could require increased public services. This could create need for new or expanded public facilities in order to maintain adequate public service levels. The construction of new and expanded facilities could cause environmental impacts.

It is likely that under the theoretical build-out scenario existing and planned park and recreation facilities may not be able to adequately serve the increased residential population. Based on the 1979 General Plan population-to park-acreage standards, many of the older urbanized areas are deficient in park acreage in relation to their current population. Fee structures identified in the mitigation framework **Section 3.13.4** would help to increase park and recreation facilities as part of the development process; however, under the theoretical build-out scenario, it is not likely that adequate park and recreation facilities could be provided to accommodate the growth beyond land currently designated for park uses. It is assumed that all residential and non-residential plan designated land would be built to their full development potential.
Mitigation framework measures summarized in **Section 3.13.4** would reduce these impacts; however, it is infeasible at this program EIR level to provide more specific mitigation that would reduce such impacts to a less than significant level since no specific public facility improvement project information is known. The considerable population growth also associated with the theoretical build-out scenario can be expected to create substantial impacts associated with construction of new or expanded public facilities needed to accommodate a substantial increase in the use of park and recreation facilities. For these reasons, these impacts would be significant and unavoidable.

3.18.14 Public Utilities

Under the theoretical build-out scenario, the increased level of development could result in an increased demand for public utilities beyond projected supplies of water, electrical power, fuel, or other forms of energy. Typically, most utility service providers in the region utilize the SANDAG regional forecast data. The increased demand for utilities under the theoretical build-out scenario could result in the construction of new or physically altered utilities in order to maintain service objectives which could cause significant environmental impacts.

Although mitigation framework measures summarized in **Section 3.14.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, impacts related to the construction or alteration of public utilities would be significant and unavoidable under the theoretical build-out scenario.

3.18.15 Transportation/Traffic/Circulation/Parking

Under the theoretical build-out scenario, the increased level of development could result in an increase in the number of roadway miles and percent of daily vehicle miles traveled at a Level of Service E or F on the planned transportation network and circulation system. Transportation planning in the San Diego region including the Year 2030 scenario uses the SANDAG regional forecast for the Year 2030. SANDAG has not produced a forecast using the theoretical build-out scenario; and Citywide and regional transportation plans and policies do not address the population and employment growth associated with a theoretical build-out scenario.

Although the mitigation framework measures summarized in **Section 3.15.4** would reduce impacts, it is infeasible at this program EIR level to provide more specific mitigation that would reduce impacts to a less than significant level, since specific development projects are not known. Due to the magnitude of change in the level of residential and non-residential development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation and the fact that regional transportation plans do not address transportation needs beyond what is anticipated in the Year 2030 forecast, transportation-related impacts would be significant and unavoidable.

3.18.16 Visual Effects and Neighborhood Character

Under the theoretical build-out scenario, the increased level of development could result in a change to neighborhood character. Areas currently occupied by with single-family homes, mobile homes, lower density multifamily homes, such as duplexes, in areas that allow multifamily uses would be replaced with multifamily uses at the maximum allowed community plan density. Existing commercial areas would also be intensified to the maximum allowable FAR. It is also assumed under the build-out scenario that there could be major alterations to the City's topography to accommodate this level of development. View corridors could also be substantially altered or blocked in some areas.

Due to the level of development under the theoretical build-out scenario and the lack of specific development projects and associated project-level mitigation, the impacts to visual effects and neighborhood character would be significant and unavoidable.

3.18.17 Water Quality

Under the theoretical build-out scenario, the increased level of development could result in an increase of non-permeable surface area. Due to the anthropogenic nature of water quality impairments, the growth in residential and employment population required to support the build-out scenario could lead to significant unavoidable impacts to regional water quality. The need for water to support the increased level of development could also require the use of ground water resources, which would also lead to degradation due to the unique attributes of regional aquifers. Significant and unavoidable impacts to groundwater could arise from the theoretical build-out scenario.